



**Health Department
HIV Health Services Clinic**

MULTNOMAH COUNTY OREGON

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Division of Global Migration and Quarantine
Centers for Disease Control and Prevention
Attn: Part 34 NPRM Comments
1600 Clifton Road, NE., MS E-03
Atlanta, Georgia 30333

TO WHOM IT MAY CONCERN:

Multnomah County HIV Health Services Center agrees with the HHS/CDC proposal to revise the Part 34 regulation to remove HIV from the list of grounds of inadmissibility to the United States. Our clinic provides comprehensive, culturally competent HIV treatment to Oregon's immigrant and refugee populations. However, we are concerned that removing HIV testing from the medical examination for U.S. immigration would threaten the health and well-being of our clients and their communities.

The public health argument to keep HIV testing as part of the medical examination is compelling. For immigrants from countries with weak public health systems or limited health literacy, education about HIV is often lacking and testing inaccessible. This clinic has seen clients who would not have known their HIV status if not for the medical examination. These are people who would suffer illness related to HIV/AIDS before becoming aware of HIV status and options for treatment. Testing for HIV as part of the medical examination creates a system in which immigrants can determine the course of their HIV treatment. The benefits of this approach, as mentioned in your article, are increased life expectancy and quality of life, and decreased likelihood of onward transmission. We urge you to maintain HIV testing as part of the medical exam because we care about the health of our clients.

If HIV testing is removed from the medical examination, who would shoulder the responsibility of providing information about HIV and access to HIV testing? CDC or another agency would need to create capacity to support testing of this vulnerable population. The proposed change by HHS/CDC does not mention any process or funding that would equip voluntary agencies or local health departments to facilitate HIV testing and counseling. These issues need to be addressed.

Thank you for your consideration of our comments.

Sincerely,